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9 Attorneys for Plaintiff

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 PCR DISTRIBUTING CO., a company
14 organized under the laws of California,

15 vs.

16 JOHN DOES 1 - 20 d/b/a,
17 NHENTAI.NET

18 Defendants.

Case No.: 2:24-cv-07453- FLA-AJR

**PLAINTIFF PCR DISTRIBUTING
CO.'S *EX PARTE* MOTION FOR
EARLY DISCOVERY**

Date: October 4, 2024

Time: 1:30 p.m.

Place: First Street Courthouse
Courtroom 6B, 6th Floor

Judge: Hon. Fernando L. Aenlle-Rocha

19 I, Jason Tucker, under penalty of perjury, declare and state as follows:

20 1. I am a United States Citizen, over the age of 18 years old, make this
21 declaration based upon personal knowledge and, if called to testify could and would
22 testify competently to the facts set forth herein.
23

24 2. I am a Director and the founder of Battleship Stance Inc., a leading
25 intellectual property management and anti-piracy enforcement company. Our
26

PLAINTIFF'S *EX PARTE* MOTION FOR EARLY
DISCOVERY

Case No. 2:24-cv-07453

- 1

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1 clients include or have included award-winning production companies, publishers,
2 media, technology, and physical product corporations, internet advertising
3 networks, documentarians, filmmakers, photographers, influencers, news outlets,
4 and award-winning entertainment studios.
5

6 3. I have been in the business of legal adult entertainment productions
7 (both on and off the Internet), marketing, and management at an executive level for
8 over twenty (20) years, serving for over six (6) years as President of a company that
9 owned and licensed one of the world's largest libraries of erotic images.
10

11 4. I have served as a consultant to Fortune 100 companies including
12 Microsoft Corporation, for the rollout of several versions of Windows Media and
13 in the development and rollout of their Digital Rights Management technology,
14 Akamai Technologies, and others.
15

16 5. As an experienced executive within the entertainment industry, I have
17 been featured and quoted in publications including Financial Times, Newsweek,
18 BusinessWeek, Torrent Freak, USA Today, Wired, and the Washington Post. I am
19 frequently requested to speak on panels and at seminars at industry events on
20 various industry-related topics and trends.
21

22 6. I have been involved in more than fifty federal lawsuits brought against
23 a range of defendants for copyright infringement and have served as an expert
24 witness in similar proceedings.
25
26

1 7. PCR Distributing Company ("Plaintiff") retained Battleship Stance,
2 Inc. to investigate copyright violations and assist in certain litigation to enforce its
3 intellectual property rights, including violations on nHentai.net.
4

5 8. I have inspected, investigated, and researched the domain and
6 website nHentai.net ("nHentai").
7

8 9. NHentai uses registrar-provided privacy services to hide the actual
9 identities of the owners and operators.
10

11 10. NHentai uses Namecheap, Inc. a Delaware company, based in
12 Phoenix, Arizona as its registrar.

13 11. NHentai uses Cloudflare, Inc., located in California, as their domain
14 name server provider.
15

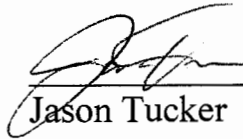
16 12. NHentai.to uses Cloudflare's Insights Analytics product.

17 13. I sent DMCA takedown notices on behalf of Plaintiff to the email
18 address listed on the info page of NHentai, as well as directly to Cloudflare, Inc.
19 and Namecheap, Inc. The notices were successfully delivered, and I did not receive
20 any bounce-back notifications indicating that the email address was invalid.
21

22 14. After a thorough investigation, neither the Plaintiff nor I have
23 discovered any additional information that could identify the Defendants, other
24 than what may be held by the domain privacy service, registrar, or other service
25 providers.
26

1
2 I declare under the penalty of perjury under the laws of the United States of
3
4 America that the foregoing is true and correct.
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6 Executed on the 5TH day of September 2024 at Las Vegas, Nevada.
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Jason Tucker
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